

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

KLAVELLE BRONNER

Case No. Case: 2:22-mj-30272
Assigned To : Unassigned
Assign. Date : 6/13/2022
USA V. BRONNER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 22, 2022 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)	Felon in Possession of a Firearm
18 U.S.C. § 922(o)	Illegal Possession of a Machine Gun

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

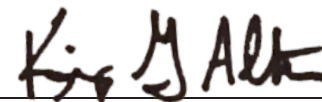
Date: June 13, 2022

City and state: Detroit, MI



Complainant's signature

Neil Gavin, Special Agent, FBI
Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Neil Gavin, having been duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigations and have been since 2004. I am currently assigned to the Detroit Violent Gang Task Force (VGTF) and tasked with investigating violent street gangs involved in violations of federal law, primarily narcotics trafficking, weapons violations and acts of violence. Prior to my current assignment, I was assigned to the Kansas City FBI, where I investigated similar violations including narcotics trafficking and violent crime.

2. This affidavit is being submitted in support of a criminal complaint alleging that KLAVELLE BRONNER has violated 18 U.S.C. § 922(g) (Felon in Possession of a Firearm) and 18 U.S.C. § 922(o) (Illegal Possession of a Machine Gun). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging BRONNER with the above listed violations, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that BRONNER committed the offenses alleged in the complaint.

3. This affidavit is based on my personal knowledge, my review of law enforcement reports, and information provided to me by other law enforcement agents and witnesses.

4. On May 22, 2022 at approximately 11:50 p.m., uniformed Warren police officers were on patrol and observed a Grey Chevrolet Equinox traveling at a high rate of speed eastbound on 8 Mile Road. The officers observed the Equinox weaving in and out of traffic while failing to signal, and they also saw the Equinox disregard a traffic signal. Warren police officers conducted a traffic stop and spoke to the driver of the vehicle, identified as KLAVELLE BRONNER. BRONNER told officers he did not possess a valid driver's license, after which a police officer asked BRONNER to step out of the vehicle. When BRONNER did so, officers noticed a black handgun laying on the driver's seat where BRONNER had been sitting.

5. BRONNER was then placed into custody, and Warren Police recovered the firearm. Upon further investigation, it was determined that the firearm was a 9 mm caliber Glock model 19 firearm and was reported stolen out of Detroit on May 5, 2021. The firearm was also outfitted with what appeared to be a "fully automatic switch," which, based upon my training and experience, is a device that is a part, or combination of parts, designed and intended for use in converting a semiautomatic Glock pistol into a weapon that shoots automatically

more than one shot, without manual reloading, by a single function of the trigger. The switch was an obvious and visible attachment to the firearm.

6. On June 10, 2022, I contacted Alcohol Tobacco and Firearms (“ATF”) Special Agent Michael Jacobs, an Interstate Nexus Special Agent, and advised him of the seizure of the 9 mm caliber Glock model 19 firearm. I gave Special Agent Jacobs a verbal description of the Glock model 19 firearm. Special Agent Jacobs, based on his training and experience, advised me that the firearm meets the federal definition of a firearm and was manufactured outside the state of Michigan, and therefore, had traveled in interstate commerce.

7. BRONNER has been previously convicted of a felony, that is, a crime punishable by a term of imprisonment of more than one year. Specifically, in 2017, he was convicted of Possession of a Firearm with an Obliterated Serial Number, in violation of 18 U.S.C. § 922(k), in the United States District Court for the Eastern District of Michigan. The court sentenced BRONNER to more than one year in prison.

8. Additionally, 18 U.S.C. § 922(o) prohibits the possession of a machinegun manufactured after May 19, 1986. An individual can affix a Glock conversion device to a Glock pistol to make the pistol shoot automatically and function as a machinegun. Pursuant to 18 U.S.C. § 921(a)(23), the term “machinegun” has the meaning given such term in section 5845(b) of the National

Firearms Act (“NFA”) (26 U.S.C. § 5845(b)). Under Section 5845(b) of the NFA, the term “machinegun” means

any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

26 U.S.C. § 5845(b).

9. A Glock conversion device such as the one on the Glock 19 found on BRONNER’s seat – commonly referred to as “Glock Switch” or “Glock Auto Sear” – is a part, or combination of parts, designed and intended for use in converting a semiautomatic Glock pistol into a weapon that shoots automatically more than one shot, without manual reloading, by a single function of the trigger machinegun; therefore, it is a “machinegun.” Further, the ATF is not aware of any Glock conversion devices that were developed before May 19, 1986. As such, Glock conversion devices are considered post-1986 machine guns.

10. Based on the facts set above, I believe that probable cause exists to believe KLAVELLE BRONNER knowingly possessed a firearm, having been previously convicted of a crime punishable by more than one year of imprisonment, in violation of 18 U.S.C. § 922(g), and knowingly possessed a

Glock firearm equipped with a conversion device on May 22, 2022, in the Eastern District of Michigan, in violation of 18 U.S.C. § 922(o) (Illegal Possession of a Machine Gun).

Respectfully submitted,



Neil Gavin
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Kimberly G. Altman
United States Magistrate Judge

Dated: June 13, 2022